

I am reply to the reply comments filed by the American Radio Relay League. In their reply comments, League states (p11):

"there is no present incompatibility between semi-automatic data operation and incumbent analog emission modes, due to the the adherence of most amateurs to voluntary band plans."

This statement is false. The fact is, that there is frequent interference caused by semi-automatic stations to controlled stations, and the fact is that there are several semi-automatic stations that have "set up shop" on frequencies that are outside of where they are authorized to be according to the existing gentlemen's agreements.

I have been interfered with personally many times in the 14060-14065 KHz range by Winlink PMBO semiautomatic stations that are operating in a segment of the band that they are not supposed to be.

As an example, the bandplans are listed at:

<http://www.arrl.org/FandES/field/regulations/conop.html>

On the 20 meter band:

14.060 QRP CW calling frequency
14.070-14.095 Data
14.095-14.0995 Automatically controlled data stations
14.100 IBP/NCDXF beacons
14.1005-14.112 Automatically controlled data stations

So the data modes are supposed to stay above 14.070 MHz, according to the "gentlemen's agreements".

But looking at the list of Winlink PMBOs at:

<http://users.iafrica.com/z/zs/zs5s/bulls/PMBO.TXT>

and I find numerous "semi-automatic" PACTOR stations set up
below 14.070 MHz (14070 KHz):

AH6QK.HI.USA.NA, Richard, [BL11cj: Oahu/HI], (03SEP18/K4CJX)

V 7070.9 10126.9 14069.0 14110.0# 18101.9

P none

E rhacker@aloha.net

H none

T 24.94.84.68

K6CYC.CA.USA.NA, Scott/N6ABC, [DM03sx: Los Angeles/CA], (05APR04)

V 7069.9 10123.9

B S Pacific & Mexico - 14068.9 14094.9# 14102.7# 21068.9 21096.2#

P none

E dr.scotts@verizon.net

H www.calyachtclub.com

T k6cyc.no-ip.com

A California Yacht Club, Marina del Rey

A Does not accept P-1 connects.

K6IXA.#CCA.CA.USA.NA, Grady, [CM97qi: Atwater], (05APR02/K7BFL)

Station 1:

V 10122.9 10143.7#

Station 2:

B 135 dgs, after 0500 240 dgs - 14064.9 14102.7#

P yes, WL2K, 144.910

E gradyw@elite.net

H www.elite.net/~gradyw/

T 206.62.222.199

KB6YNO.#NCA.CA.USA.NA, Eric, [CM88qg: Petaluma], (05FEB27)

V 7063.9 10124.9 14063.9 14108.9# 18098.9

P yes, WL2K, 144.910

E kb6yno@comcast.net

H http://www.qsl.net/kb6yno

T kb6yno.no-ip.com

KL7EDK.AK.USA.NA, Jerry, [BP64GV: Fairbanks], (05JUL15)

V 3627.9 3627.9# 7065.9 7104.4# 10147.7 10147.7# 14064.0 14098.5#

P yes, WL2K, 147.960
E jercurry@att.net
H none
T kl7edk.no-ip.com

KN6KB.#MLBFL.FL.USA.NA, Rick, [EL98pq: nr Melbourne/FL], (05JAN19)

V 7068.9 7103.7# 10146.2# 14066.4
P yes, WL2K, 145.090 & 441.000 (1200)
E rmuething@cfl.rr.com
H www.dwatt.com/users/kn6kb.html
T kn6kb.no-ip.com
A Pactor-1 connects between 0000z and 1200z only.

W7IJ.#WWA.WA.USA.NA, Bill, [CN86sv: nr Olympia], (05JAN01)

Station-1:
B 240 dgs/SW: 14069.4 14110.0# 21077.9 21091.2#
Station-2:
LW 7068.9 7103.7# 10139.5
D 3631.9 3631.9#
P yes, WL2K, 145.070
E w7ij@arrl.net
H none
T w7ij.no-ip.com
A Accepts Pactor-1 connects on 3631.9 only

W9MR.#SEIL.IL.USA.NA, Ken, [EM68bi: Keensburg], (05AUG21/K4CJX)

V 7065.9 10145.2# 14069.0 14101.7#
P none
E kmw9mr@shawneelink.net
H none

WB0TAX.LA.USA.NA, Deni, [EM32gi: Shreveport/LA], (05NOV02)

D 2200-1200: 3636.9 3636.9#
D H24: 7103.7# 10143.7#
B SE: 14066.9 14096.2#
D 1100-2400: 18106.2#
P none
E deni@dwatt.com
H www.dwatt.com

T 70.148.96.70

A not accepting Pactor-1 connects

WH6DS.HI.USA.NA, Ron, [BL11cg: Honolulu/HI], (02FEB15/K4CJX)

V 3641.9 3641.9# 7103.7# 10142.7 10142.7# 14064.4 14109.2#
18106.2 18106.2#

P none

E wh6ds@aol.com

H none

T wh6ds.no-ip.org

WU3V.MT.USA.NA, Jim, [DN47jl: Grea Falls], (05NOV18)

Station-1:

D 7074.9 7103.7# 10126.9 10143.4#

B SW: 14069.0 14102.7#

Station-2:

D 3631.2 3631.2#

B Pacific: 21109.4#

P WU3V-9 Telpac on 145.010 and 145.090

E james@wu3v.net

H none

T moe.wu3v.net or wu3v.no-ip.com (port 12001)

WX4J.FL.USA.NA, Earl, [EM90ec: nr Jacksonville], (05MAR30)

Station-1:

D 3622.4# 7066.9

Station-2:

D 10143.4# 14066.9

P Yes, 144.990 Telpac gateway: WX4J-10, WL2K 144.930

E unlisted

H none

T WX4J.NO-IP.COM

A Pactor-1 connects accepted on 3622.4 and 7066.9

The League's statement that the gentlemen's agreements are widely adhered to is simply false. Voluntary agreements aren't working very well.

Semi-automatic stations should share the same band segments with fully automatic stations, which should be established by rule, and widened somewhat to accomodate the semi-automatics.

Thank you for the opportunity to comment.

Respectfully Submitted,

Scott A. McMullen, W5ESE
ARRL Life Member